

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
2024 JAN 17 PM 3:57
OFFICE OF THE CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

8:23CR215

JOSE RODRIGO ALEJANDRO MUNIZ,
JONATHAN OVALLE SOLIS, PETER V.
BULLER, JADEN D. REIMAN, OSCAR
CEBREROS-TIRADO, JASON UNRUH,
JODY D. WEBB, CARINDA M. BLAIR,
HENRY W. SCHLOTFELD III, and
RICHARD BIRK HARRIS,

Defendants.

SUPERSEDING INDICTMENT
21 U.S.C. § 846
21 U.S.C. § 841(a)(1) & (b)(1)
21 U.S.C. §853

The Grand Jury charges that:

COUNT I

Beginning as early as April 1, 2021, and continuing to on or about January 10, 2024, in the District of Nebraska and elsewhere, Defendants JOSE RODRIGO ALEJANDRO MUNIZ, JONATHAN OVALLE SOLIS, PETER V. BULLER, JADEN D. REIMAN, OSCAR CEBREROS-TIRADO, JASON UNRUH, JODY D. WEBB, CARINDA M. BLAIR, HENRY W. SCHLOTFELD III, AND RICHARD BIRK HARRIS, did knowingly and intentionally combine, conspire, confederate, and agree together and with other persons to distribute and possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1).

In violation of Title 21, United States Code, Section 846.

Before OSCAR CEBREROS-TIRADO committed the offense charged in this Count, he had a final conviction for a serious drug felony, namely, a conviction under 21 U.S.C. § 841(a)(1) & (b)(1) for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT II

On or about September 26, 2023, in the District of Nebraska, Defendant JOSE RODRIGO ALEJANDRO MUNIZ did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 21, United States Code, Section 841(b)(1).

COUNT III

On or about July 20, 2023, in the District of Nebraska, Defendant JONATHAN OVALLE SOLIS did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 21, United States Code, Section 841(b)(1).

COUNT IV

On or about September 12, 2023, in the District of Nebraska, Defendant PETER V. BULLER did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 21, United States Code, Section 841(b)(1).

COUNT V

On or about August 23, 2023, in the District of Nebraska, Defendant JADEN D. REIMAN did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 21, United States Code, Section 841(b)(1).

FORFEITURE ALLEGATION

1. The allegations contained in Counts I and II of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, conspiracy to distribute a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, and Title 21, United States Code, Section 841(a)(1) and Title 21, United States Code, Section 841(b)(1), possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, Defendant JOSE RODRIGO ALEJANDRO MUNIZ shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to

commit, or to facilitate the commission of, the offense. The property to be forfeited includes, but is not limited to:

- a. United States currency in the amount of \$2,750 seized from the possession of JOSE RODRIGO ALEJANDRO MUNIZ on or about September 26, 2023.

3. If any of the property described above, as a result of any act or omission of Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;


1. the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

2. In violation of Title 21, United States Code, Section 853.

A TRUE BILL.

FOR PERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.


THOMAS J. KANGIOR,
Assistant United States Attorney